Charter

HIPAA Project at Texas Department of Health

Purpose:

Assure TDH compliance with the Health Insurance Portability & Accountability Act.

Scope:

HIPAA requirements include, but are not limited to, standardizing electronic health information and ensuring the security and privacy of health information. Covered entities include health plans, health care providers, and health care clearinghouses. The scope of this project involves all activities necessary for TDH to become HIPAA compliant. This includes:

- Determining all TDH programs and their contractors covered by the HIPAA legislation.
- Ensuring TDH business processes, functional job descriptions, and computer systems are adapted, where necessary.
- Leveraging existing systems so that information is shared with or provided to automated systems that fall directly under HIPAA rules.
- Involving the Public Information Office and Program Management to answer inquiries from the public, health care providers, private contractors, and others about HIPAA rules and TDH's progress in achieving compliance.
- Coordinating closely with the Health and Human Services Commission (HHSC) HIPAA Program Office and any other necessary agencies.

Objectives:

- 100% compliance within timeframes established by HIPAA rules.
- HIPAA activities and costs accurately reflected in the Strategic Plan, Biennial Operating Plan, and Legislative Appropriations Request.
- Necessary funding obtained to meet target dates.
- Well-informed TDH management and program staff throughout the project.
- Well-informed public and provider community regarding TDH's interpretation of HIPAA rules and progress toward compliance.
- Close, collaborative working relationship with HHSC and timely progress reporting in accordance with HHSC standards.

Assumptions:

- **HIPAA Steering Committee** – The Information Resource Systems Committee (IRSC) recommended a dedicated HIPAA Project Manager be hired accountable to the executive deputy commissioner. TDH executive management temporarily delegated oversight responsibility to Tom Thornton, Associate Commissioner for Information Systems.

- **Project Management** - It is projected approximately 60-90 days will be required to hire a dedicated Project Manager. In the interim, Judy Sandberg, Director of Enterprise Systems in the Information Systems Associateship will serve as Project Manager. This will allow the agency to begin the assessment phase for gap analysis.

  The TDH HIPAA Project Manager is responsible for proactively providing information to TDH staff, coordinating with Program Management to complete business and systems gap analyses and cost estimates, and following up to assure information is provided to and obtained from every TDH program area or facility. (See job description for complete list of responsibilities.)

- **TDH Program Management** – The management of each Program or facility is responsible for assessing the impact of HIPAA on their program/facility and systems. The TDH HIPAA Project Manager will be available to consult with Program Management or their designees to assist them with business and systems gap analysis for their areas.

- **Agency HIPAA Liaisons** – The Executive Deputy Commissioner, each Deputy Commissioner, and each Associate Commissioner will appoint one HIPAA Liaison for their management area. The HIPAA Project Manager will coordinate with the Liaisons to assure information is shared, surveys and action items are completed by deadlines, and to schedule meetings. The Liaison may be a program subject matter expert (SME) but it is not necessary. The Liaison should be an individual such as the Chief of Staff, who has the influence and authority to distribute/collect information, assure Program Management completes requirements and meets deadlines. The Liaison will also serve as a point of contact for the HIPAA Project Manager.

- **Time Commitment** – Staff designated as HIPAA Liaisons should plan to attend a one-hour kickoff meeting, a two-hour HIPAA orientation, communicate with Program Management to share information and tasks with deadlines, follow-up to ensure program staff complete surveys and tasks by due dates, and attend bi-weekly one-hour project status meetings during the first 90 days of the project. This interval may change as the project progresses. Additionally, Liaisons will need to coordinate with their Associate Commissioners, Deputy Commissioners, or Executive Deputy Commissioner, as appropriate, to keep staff in their management area informed. Program experts may be asked to serve on HHSC workgroups.

- **Communication Model** – Open, free-flowing communication will be encouraged with a focused effort to keep the Project Manager "in the loop". All staff representing TDH at task force meetings, work groups, on conference calls, or reporting to other entities should brief the Project Manager on activities. Any HIPAA-related commitments or agreements on behalf of TDH require the Project Manager's advance approval.

- **Risk Management** – To mitigate risks, the following actions will be taken:

  - Perform risk identification, both internal and external, throughout the life of the project. Focus on opportunities as well as threats to project success.
  - Publish and maintain a "top 10" risk list.
  - Continuously quantify risks to determine where corrective action may be needed.
  - Continuously determine steps necessary to avoid or mitigate risks or accept unchangeable consequences by developing a contingency plan, if necessary.

o Continuously evaluate progress and adapt the project plan, work breakdown structure (WBS), and schedule as needed to meet deadlines and stay within budget.
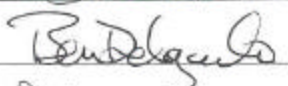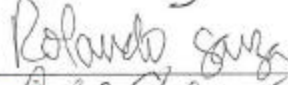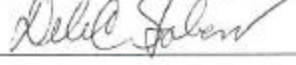
Constraints:

- **Timeframes** - The project should be launched immediately to achieve compliance by target dates. HIPAA legislation requires compliance within two years after implementation. Transactions and code sets must be compliant by October 2002. Privacy compliance is required by April 2003. Additional final and proposed rules are anticipated during calendar year 2001, requiring compliance during year 2003.

- **Budget** – TDH will establish a HIPAA Project Budget with the Project Manager as the approval authority for all expenditures. HIPAA related expenses will be allocated back to the Programs. The Project Manager and Program Management should collaborate to collect and maintain accurate project costs for TDH.

- **Quality Assurance** – Project quality assurance will be coordinated with the TDH Director of Planning and Quality Assurance in the Information Systems Associateship.

Deliverables:

- Weekly progress reports to the HHSC HIPAA Program Office.
- Monthly management reports to TDH executives and the IRSC.
- Periodic presentations to TDH staff.

Reporting and Plan:

TDH will develop a project plan with a detailed WBS to track progress. The TDH Project Manager will serve as the centralized collection point to maintain a consolidated TDH project plan.

NAME	TITLE	SIGNATURE	DATE
Debbie Blount	Deputy Commissioner, Health Care Financing		5-20
Ben Delgado	Deputy Commissioner for Operations		5/23/01
Rolando Garza	Acting Deputy Commissioner for Administration		
Debra Stabeno	Deputy Commissioner for Programs		5-15-01
Charles Bell, M.D.	Executive Deputy Commissioner		05/25/01